

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: FIELDWOOD ENERGY LLC, et al., Debtors.¹	§ § § § § § §	Chapter 11 Case No. 20-33948 (MI) (Jointly Administered) Re: Docket No. 716 & 747
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**CERTIFICATE OF NO OBJECTION TO (I) MOTION OF DEBTORS FOR
ORDER AUTHORIZING DEBTORS TO FILE RYAN LLC RETENTION
APPLICATION UNDER SEAL, AND (II) CORRECTED APPLICATION
OF DEBTORS FOR AUTHORITY TO RETAIN AND EMPLOY RYAN, LLC AS
TAX CONSULTANT TO THE DEBTORS EFFECTIVE AS OF THE PETITION DATE**

1. On December 30, 2020, Fieldwood Energy LLC and its debtor affiliates in the above-captioned chapter 11 cases, as debtors and debtors in possession (collectively, the “**Debtors**”), filed the *Motion of Debtors for Order Authorizing Debtors to File Ryan LLC Retention Application under Seal* (Docket No. 716) (the “**Motion**”).

2. On January 7, 2021, the Debtors filed the *Corrected Application of Debtors for Authority to Retain and Employ Ryan, LLC as Tax Consultant to the Debtors Effective as of the Petition Date* (Docket No. 747) (the “**Application**”). Certain commercial information in the Application is redacted. Pursuant to the Motion, the Debtors seek authority to redact the commercial information in the Application.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

3. Objections to the Motion were required to be filed and served by January 21, 2021, and objections to the Application were required to be filed and served by January 28, 2021 (the “**Objection Deadlines**”). Pursuant to stipulations, the Objection Deadlines for the United States Trustee for Region 7 (the “**U.S. Trustee**”) were subsequently extended through and including February 11, 2021 (Docket Nos. 771, 809, and 856).

4. Prior to the expiration of the Objection Deadlines, the Debtors received comments from the U.S. Trustee to the Application and Motion. Specifically, the U.S. Trustee requested that certain information in the Application not be redacted. Following receipt of the comments, the Debtors, U.S. Trustee and Ryan reached an agreement as to the extent of the redactions in the Application. A revised version of the Application containing the redactions agreed to by the parties is annexed hereto as **Exhibit A** (the “**Redacted Application**”).

5. Prior to the expiration of the Objection Deadlines, the Debtors also received comments from the U.S. Trustee to the Travis Declaration (as defined in the Application). A revised draft of the Travis Declaration incorporating the U.S. Trustee’s comments is annexed hereto as **Exhibit B** (the “**Revised Travis Declaration**”).

6. In accordance with paragraph 41 of the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas*, the undersigned counsel files this Certificate of No Objection and represents to the Court that (i) more than 24 hours have passed since the Objection Deadlines, (ii) the undersigned counsel is unaware of any objections to the Motion or the Application, and (iii) the undersigned counsel has reviewed the Court’s docket and no objections or responses to the Motion or Application appear thereon.

7. Therefore, the Debtors respectfully request entry of the revised proposed order for the Motion annexed hereto as **Exhibit C** (the “**Revised Proposed Motion Order**”). A

blackline of the Revised Proposed Motion Order marked against the version filed with the Motion is annexed hereto as **Exhibit D**.

8. The Debtors also respectfully request entry of the revised proposed order for the Application annexed hereto as **Exhibit E** (the “**Revised Proposed Application Order**” and, together with the Revised Proposed Motion Order, the “**Revised Proposed Orders**”). A blackline of the Revised Proposed Application Order marked against the version filed with the Application is annexed hereto as **Exhibit F**.

9. Prior to filing this Certificate of No Objection, the Debtors provided copies of the Revised Proposed Orders to the U.S. Trustee and Creditors’ Committee. The Revised Proposed Orders incorporate comments received.

Dated: February 22, 2021
Houston, Texas

Respectfully submitted,

/s/ Alfredo R. Pérez

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Attorneys for Debtors

and Debtors in Possession

Certificate of Service

I hereby certify that on February 22, 2021, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Alfredo R. Pérez

Alfredo R. Pérez